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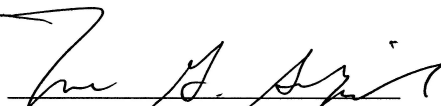
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January 30, 2023

The Honorable Judge Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Application **GRANTED**. The parties shall meet and confer regarding any remaining issues and file a joint status letter stating whether this matter may be closed no later than **February 6, 2023**. So Ordered.

Dated: January 31, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: **In re Application of Carolina Andraus Lane**  
**1:22-mc-000034**

*Joint letter for advising the Court with regard to the status of Your Honor's Order dated January 20, 2023*

Dear Judge Schofield:

I am counsel for the Applicant, Carolina Andraus Lane (hereinafter "Applicant"), in the above-captioned matter. I am submitting this letter jointly on behalf of all Parties who appeared in this action.

On January 10, 2022 (ECF # 28), Your Honor issued an Order requiring the Parties to apprise the Court what issues remain in need of judicial resolution.

First, I would like to apologize to the Court for the late filing. I inadvertently sent my proposed status letter to my client instead of my adversary. I realized my mistake long after the business hours.

On January 25, and January 30, 2023, counselors for their respective Parties met and conferred over the phone and agreed to the following:

- (1) Fox, Horan, and Camerini LLP ("FHC") shall search and produce for Admiral, Acacia, and Spetses Trusts<sup>1</sup>:
  - a. Trust formation documents and any amendments thereto in the final form;
  - b. Protector Committee minutes in the final form;

<sup>1</sup> Although the Subpoena authorized by the Court did not apply to the Kilmet Trust or the Carolina Trust, counsel are discussing whether to voluntarily expand the scope of the Subpoena to include those two trusts or if it will be necessary to raise the issue with the Court.

- c. Financial institution account statements, to the extent that those statements show the inflow and outflow of capital.
- (2) FHC shall search and produce invoices issued by FHC relating to Admiral Trust, Carolina Trust, Acacia Executive Holdings Inc, Aglais Investment Company, Deanston Worldwide Limited, Eagle Technologies, LLC, KKW Venture Capital Investment Co, KKW Venture Capital LLC, Spetses Executive Holding for following periods:
- a. July to December 2007;
  - b. July to December 2010;
  - c. January to July 2015

Applicant believes that the above shall satisfy the requirements of the subpoena to FHC but reserves the right to request more documents based on the production.

The Parties believe that the new reduced document demand shall significantly reduce the production burden.

While the Parties still disagree about the cost of production, but depending on the amount of costs involved, which counsel for the Respondent will be able to more readily ascertain within the coming days, the Parties may be able to work out a solution.

To that extent the Parties are respectfully requesting another control date of February 6, 2023.

Respectfully submitted,

/s/Kadochnikov

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Alexander Kadochnikov, Esq.